BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

DIRECT TESTIMONY OF

STEVE J. VETSCH

ON BEHALF OF
EVERGY METRO, INC., EVERGY KANSAS CENTRAL, INC.
AND EVERGY KANSAS SOUTH, INC.

IN THE MATTER OF THE APPLICATION OF NEXTERA ENERGY TRANSMISSION SOUTHWEST, LLC FOR A LIMITED CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO TRANSACT THE BUSINESS OF A PUBLIC UTILITY IN THE STATE OF KANSAS

DOCKET NO. 22-NETE-419-COC

Q. Please state your name and business address.

A. Steve Vetsch. 818 S. Kansas Ave., Topeka, KS 66612

Q. By whom are you employed?

A. Evergy, Inc.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of Evergy Metro, Inc., Evergy Kansas Central, Inc., and Evergy Kansas South, Inc. ("Evergy").

Q. Please summarize your work experience and education?

A. My current position at Evergy is Senior Director of Large Transmission Construction. Prior positions at Evergy included Power Generation Operator, Power Trader, Director of Trading, Human Resources Generalist, and Senior Director of Distribution Operations. I have BBA in Finance from the University of North Dakota and an Associate's Degree in Power Plant Technology from Bismarck State College.

Q. Have you previously provided testimony before the Kansas Corporation Commission?

A. No.

Q. Has the testimony you are providing in this matter been prepared by you?

A. Yes.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to address reliability concerns related to the engineering, design, operation and management of the Wolf Creek-Blackberry (WC-BB) 345 kV single-circuit transmission line, as well as concerns related to landowner interactions in connection with the project. I also will suggest conditions that should be imposed to help alleviate these concerns should the Commission grant NEET Southwest ("NEET SW") a limited Certificate of Convenience (COC) to operate as a public utility in Kansas for the sole purpose of constructing, maintaining and operating the WC-BB 345 kV line.

Q. Have you reviewed NEET SW's application for COC to construct the WC-BB 345 kV line in Kansas?

A. Yes.

Q. Have you reviewed other information related to the project?

A. Yes. But there were tight restrictions on my access to information. I was not given access to the confidential-competitive information produced in this docket, which has hindered my ability to address the issues as thoroughly as I would have liked. Because of those constraints, my testimony is limited to identifying my concerns in broad terms and suggesting general conditions to help alleviate those concerns.

Q. Based on your review of the information made available to you, what are your principal concerns with the project?

A. My overriding concern is reliability. The proposed WC-BB 345 kV line will interconnect with the Wolf Creek nuclear power plant. That presents unique reliability and operational challenges.

Q. What are the unique nuclear-related reliability challenges?

Nuclear power plants are designed for continuous operation. Reliability and stability are essential for the safe and economic operation of a nuclear plant because outage management for these facilities is a complex task. Granted, adding a fourth 345 kV line should improve operational stability. But any line that interconnects with Wolf Creek should be built to engineering and design standards that ensure optimal reliability. The engineering and design standards for any new line should at minimum meet the engineering and design standards for the existing 345 kV lines at Wolf Creek.

Q. Based on the limited information you have been able to access, do you believe the proposed WC-BB 345 kV line meets those engineering and design standards?

A. Again, it is very difficult to evaluate the project given the information access restrictions. But, in general, based on my experience, it is difficult to see how a reliable 345 kV line could be constructed for $906K per mile. That is approximately 40% lower than SPP's initial cost estimate. If the objective is to meet the reliability standard for the existing three lines at Wolf Creek, NEET SW's bid does not seem plausible. I am concerned NEET SW will compromise reliability to minimize the cost overruns that will inevitably occur in connection with the project.

Q. Have you identified any specific areas where the proposed project does not meet applicable design standards?

A. I am concerned about the redundant communication path for the project. Only one of the static wires in NEET SW's design meets SPP's fiber optics standard. It is my understanding that NEET SW intends to install an OPGW wire as the primary communication path and lease a dark fiber path for the redundant communication path. NEET SW's proposed design does not meet Evergy's interconnection standards established in the SPP RFP. This is confirmed in NEET SW's responses to Evergy Data Requests 11 and 12. (NEET SW Resp. to Evergy DR-11, attached as **Exhibit SJV-1** and NEET SW Resp. to Evergy DR-12, attached as **Exhibit SJV-2**).

Q. You mentioned unique operational challenges. What are those operational challenges?

A. It is my understanding that NEET SW's current plan is to interconnect inside the boundaries of the Wolf Creek plant property. That raises a variety concerns related to

security, access, and coordination of maintenance, line siting, and other work at the nuclear facility.

Q. Please explain your concerns in that regard.

A. Interconnecting at the Wolf Creek substation inside the owner controlled area creates a number of additional challenges, especially given the timing of the planned refueling outage. There will be additional oversight and work coordination issues to resolve. We will have to create new security and operational protocols. We also will have to negotiate an easement on the plant property. All of this could be avoided if NEET SW connected outside the boundaries of the plant property. This solution could be negotiated between NEET SW and Evergy and would only move NEET SW's interconnection point by a little over one mile while greatly simplifying not only the original interconnection but certainly ongoing operation and maintenance work required on the line within Wolf Creek's property lines.

Q. You mentioned having concerns related to the engineering and design of the proposed project. What are those concerns?

A. I have concerns about the structural reliability of the spun concrete poles. Concrete poles are very rarely used in this part of the country, and NEET SW does not have studies comparing the long-term reliability and maintenance costs of these structures to steel structures. (NEET SW Resp. to Evergy DR-13, attached as **Exhibit SJV-3**). These structures must be built to stand up to strong winds, tornadoes, freezing rain, ice, and other Kansas weather conditions.

Q. Why are concrete poles a problem?

A. Concrete poles are heavy and long, so they are difficult to transport and erect. This raises concerns about storm readiness, outage response and restoration management. These structures are cumbersome and require heavy equipment to move, which increases the duration of service interruptions. The problems are compounded here because of accessibility concerns. The proposed line will traverse remote areas that are not easy to access.

Q. Do you have other reliability concerns related to the project design?

A. Yes. It is my understanding that NEET SW's plan is to construct the proposed WC-BB 345 kV line parallel to a 161 kV line Evergy is constructing in the area.

Q. Why is that a concern?

My concern is physical clearance. There should be no easement overlap in this corridor, and the right-of-way boundaries should be sufficiently wide to accommodate Evergy's line without interference. As I mentioned, the concrete poles NEET SW is planning to erect are much longer and heavier than normal utility poles. That also must be taken into consideration. I also have concerns about Evergy's ability to expand its current easement in the near future to accommodate reconstruction of Evergy's parallel 161 kV line. Likewise, NEET SW should be required to meet Evergy's standards for crossing facilities.

Q. Do you have any other structural design concerns?

A. It is important that adequate storm structures be erected to minimize outages and restore service quickly and efficiently. To prevent cascading failures these structures

generally should be installed at maximum intervals of 25 miles, targeted to locations where the consequences of failure would be most severe, such as highway crossings.

Q. You mentioned having concerns related to landowner interactions. What are your concerns in that regard?

A. Evergy has a history of good outcomes with landowners. We are Kansas residents, so we understand the attachment Kansans have to their land. We value our relationships with landowners and do our best to let them know we care. We also conduct easement negotiations in good faith to ensure landowners receive fair compensation for their land. We are accountable to Kansas landowners. Our fear is that NEET SW might not have the same approach to landowner relations.

Q. What is your concern in that regard?

NEET SW has constructed transmission lines in Kansas, but it has not obtained the status of a Kansas utility with condemnation powers. Evergy has invested a lot in developing landowner goodwill. If NEET SW is granted a limited COC, its landowner relations standards should be compatible with Evergy's landowner relations standards. Landowners know Evergy, so if they are not happy, they will call us, not NEET SW.

Q. Should the Commission grant a limited COC to NEET SW to construct, operate and maintain the WC-BB 345 kV line, what conditions should the Commission impose?

A. I would urge the Commission to prescribe a number of conditions to protect the public interest. Mr. Ives and Mr. Harrison have addressed many of those conditions. From an operational perspective, I also recommend the following conditions be adopted:

(1) a specific condition requiring NEET SW to interconnect outside the owner controlled area of the Wolf Creek plant;

(2) a condition requiring the project's communication paths to meet SPP's fiber optics standards and Evergy's interconnection standards;

(3) a condition requiring storm structures at maximum intervals of 25 miles targeted to locations where the consequences of failure would be most severe;

(4) a condition requiring NEET SW to meet Evergy's engineering and design standards for the existing 345 kV lines at the Wolf Creek plant;

(5) a condition requiring the project's ROW boundaries to be sufficiently wide to accommodate Evergy's parallel 161 kV line, with no easement overlap, and to provide adequate clearance for Evergy to expand its current easement to accommodate reconstruction of the parallel line.

Q. Does this conclude your testimony?

A. Yes.

EVERGY, INC.

NextEra CCN Docket
Docket No. 22-NETE-419-COC

Data Request No: 11

Submitted to: NextEra Energy Transmission Southwest, LLC

Request Date: April 21, 2022

Date Information Needed: May 5, 2022

DATA REQUEST EVERGY - 11:

Please provide the following:

11) How have the following Evergy interconnection and design requirements been incorporated into the Wolf Creek-Blackberry design including, but not limited to, the use of two OPGWs for the primary and redundant communications paths as well as adherence to Evergy requirements outlined in an encroachment agreement?

a. Termination of two OPGW fiber cables at Wolf Creek substation for both the primary and redundant communications path for this as project specified in SPP-RFP-000003 Wolf Creek-Blackberry_Updated120720. Posted 2/2/2021.

i. Wolf Creek-Blackberry RFP Excerpt: “The transmission line deadend structure will be constructed and owned by the incumbent substation owner. The DTO will own the conductor and the insulators attaching to the deadend structure. The substation owner will attach jumpers to the incoming line at the deadend structure, providing all hardware and conductor necessary to connect from the tap point to the substation bus work. Additionally, the substation owner will provide splice cans on the legs of the substation deadend for termination of the two OPGW fiber cables. DTO will be responsible for attaching OPGW to substation deadend and providing sufficient OPGW for several loops around the splice can. Substation owner will be responsible for terminating OPGW in the splice cans. The selected DTO for the transmission line should reflect any costs/hardware associated with constructing and owning their structures but not include any costs/hardware identified as being owned by the incumbent substation owner to meet this point of interconnection.”

b. RFP Q&A Log #6. Posted 1/15/2021

i. Q&A Log Excerpt: "On January 8, 2021, SPP posted a zip file to the WC-BB folder on spp.org informing potential respondents of requirements the incumbent utility for the Wolf Creek end of the line requires. The notice and agreement may be found at the following location: spp.org - spp

documents - engineering & planning - Order 1000 - Order 1000 documents - RFP000003 Wolf Creek-Blackberry 345kV"

c. Were any additional costs associated with these requirements accounted for in NEET SW's RFP Response Cost Estimate for the Wolf Creek-Blackberry 345 kV project?

NEET SOUTHWEST'S RESPONSE TO DATA REQUEST EVERGY-11:

a. Per the SPP RFP-000003, "Fiber optic shall be used for both the primary and redundant communication paths for this project". Based on this requirement, NEET Southwest plans to install an OPGW wire on the line as the primary communication path and lease a dark fiber path for the redundant communication path.

b. Per the documentation provided in a zip file with the SPP RPF Q&A Log #6, Evergy requires a dead-end structure to be located on both sides of each transmission line crossing. NEET Southwest's proposed design therefore located a full tension dead-end structure on each side of all planned crossings of Evergy transmission lines.

c. The line design complied with the requirements specified in the zip file provided in RFP Q&A log #6. In addition, the proposal complies with SPP requirements related to the communication path and fiber requirements. The estimate was based on the fully compliant design, and therefore the costs of these requirements were incorporated in the bid.

Verification of Response

I have read the foregoing Data Request and answer(s) thereto and find the answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which effects the accuracy or completeness of the answer(s) to this Data Request.

Signed: ***Daniel Mayers***
Director, Transmission & Substation Engineering
NextEra Energy Resources, LLC

Date: May 5, 2022

EVERGY, INC.

NextEra CCN Docket
Docket No. 22-NETE-419-COC

Data Request No: 12

Submitted to: NextEra Energy Transmission Southwest, LLC

Request Date: April 21, 2022

Date Information Needed: May 5, 2022

DATA REQUEST EVERGY - 12:

Please provide the following:

12) Will the primary and redundant communications use dark fiber?

a. How will NEET ensure they meet the technical performance requirements specified in Q&A Log #9, Posted 1/15/2021? The relevant Excerpt:

i. "The OPGW fiber optic communication system will consist of 48-count fiber with optical losses no greater than 0.40 db/km at 1310nm and 0.30 db/km at 1550nm"

NEET SOUTHWEST'S RESPONSE TO DATA REQUEST EVERGY-12:

NEET Southwest plans to install an OPGW for the primary communication path and use a leased dark fiber path for the redundant communication path.

a. The OPGW proposed by NEET Southwest has 48 single mode fibers compliant with the requirements of the ITU-T G.652.D Standard, meeting or exceeding the specified attenuation requirements. Testing of the fiber is performed at the factory prior to shipment, and final testing will be performed either as a full end to end test or on sections of the OPGW after installation to verify compliance, subject to the limitations of the test equipment.

Verification of Response

I have read the foregoing Data Request and answer(s) thereto and find the answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which effects the accuracy or completeness of the answer(s) to this Data Request.

EVERGY, INC.
NextEra CCN Docket
Docket No. 22-NETE-419-COC

Signed: ***Daniel Mayers***
Director, Transmission & Substation Engineering
NextEra Energy Resources, LLC

Date: May 5, 2022

EVERGY, INC.

NextEra CCN Docket
Docket No. 22-NETE-419-COC

Data Request No: 13

Submitted to: NextEra Energy Transmission Southwest, LLC

Request Date: April 21, 2022

Date Information Needed: May 5, 2022

DATA REQUEST EVERGY - 13:

Please provide the following:

13) Describe whether and/or how have safety, reliability, and landowner impacts been considered in the routing and design processes for the Wolf Creek-Blackberry 345 kV project in the following circumstances:

a. NEET SW's design calls for 540 towers versus other proposals that recommended as few as 470. This design encumbers more land and has a greater aesthetic impact to nearby landowners.

b. NEET SW's design uses guyed structures for angle and dead-end structures that present safety risks, encumber far greater surface area of land, are more vulnerable (reliability), and more expensive to maintain than self-supporting structures such as:

   i. Guyed support systems are deemed incompatible with highly cultivated field project locations due to increased vulnerability to impacts of irrigation and agricultural chemicals in use, and to significantly increased risk of impact by agricultural equipment.
   ii. Good Samaritan electrocuted in OK after equipment struck guyed pole
   iii. Crop yield more significantly reduced when guyed structures are installed due to vastly bigger surface area that must be maintained for the guys and anchors compared only the structures.

c. Please provide NextEra studies and data comparing the long-term reliability and maintenance costs of spun concrete structures, both self-supporting and guyed, to steel structures, both direct imbed and foundation, in the Kansas climate.

   i. What percentage of structures would have foundations?

d. What steps is NextEra taking to ensure landowner land is properly restored due to construction impacts?

EVERGY, INC.
NextEra CCN Docket
Docket No. 22-NETE-419-COC

NEET SOUTHWEST'S RESPONSE TO DATA REQUEST EVERGY-13:

Subject to and without waiving NEET Southwest's objections provided on April 28, 2022, please see the following responses:

a. Evergy has withdrawn this request.

b. Evergy has withdrawn this request.

c. NEET Southwest does not have studies and data comparing the long-term reliability and maintenance costs of spun concrete structures, both self-supporting and guyed, to steel structures, both direct imbed and foundation, in the Kansas climate. NEET Southwest affiliates have long term experience with both types of structures in various climates, including Kansas. This experience indicates that spun concrete poles will last longer and have lower maintenance costs than steel poles. Subject to the final route approved by the Commission and the Missouri Public Service Commission and based upon preliminary design, NEET Southwest currently expects to have six structures with drilled shaft foundations. This number is also subject to change upon review of site and soil conditions.

d. NEET Southwest requires that all disturbed land is restored to its pre-construction conditions. Pre-construction Lidar is flown to determine pre-construction contours. Post-construction Lidar will be flown to determine post-construction contours to make sure the topography matches pre-construction conditions. NEET Southwest requires that all disturbed areas are re-vegetated with the native species in accordance with all project permits. NEET Southwest will work closely with the landowners pre- and post-construction to make sure concerns raised are properly handled during the restoration and reclamation process.

Verification of Response

I have read the foregoing Data Request and answer(s) thereto and find the answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which effects the accuracy or completeness of the answer(s) to this Data Request.

Signed: ***Daniel Mayers***
Director, Transmission & Substation Engineering
NextEra Energy Resources, LLC

Date: May 5, 2022

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

Steve Vetsch, being duly sworn upon his oath deposes and states that he is the Sr. Director, Large TS Construction, for Evergy, Inc., that he has read and is familiar with the foregoing Direct Testimony, and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.

Steve Vetsch

Subscribed and sworn to before me this 17 day of May, 2022.

Notary Public

My Appointment Expires:
May 30, 2022

NOTARY PUBLIC - State of Kansas
LESLIE R. WINES
My Appt. Exp. 5/30/2022

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing testimony was electronically served this 17th day of May, 2022 to:

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